

Instructions for Using the Plan Review Crosswalk for Review of Local Mitigation Plans

Attached is a Plan Review Crosswalk based on the **Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000**, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with **44 CFR Part 201 – Mitigation Planning, Interim Final Rule** (the Rule), in accordance with the **Stafford Act** (42 U.S.C. 5165), and **44 CFR Part 78.5 – Flood Mitigation Plan Development**, in accordance with the **National Flood Insurance Act of 1968** (42 U.S.C. 4104c et seq).

SCORING SYSTEM

N – Needs Improvement: The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory." A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing.

When reviewing single jurisdiction plans, reviewers may want to put an N/A in the boxes for multi-jurisdictional plan requirements. When reviewing multi-jurisdictional plans, reviewers may want to put an N/A in the prerequisite box for single jurisdiction plans.

States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

Optional matrices for assisting in the review of sections on profiling hazards, assessing vulnerability, and identifying and analyzing mitigation actions are found at the end of the Plan Review Crosswalk.

The example below illustrates how to fill in the Plan Review Crosswalk.

Example

Assessing Vulnerability: Overview

- Multihazard Requirement §201.6(c)(2)(ii):** *[The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.*
- FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			Stafford		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Section II, pp. 4-10	The plan describes the types of assets that are located within geographically defined hazard areas as well as those that would be affected by winter storms.		✓		✓
B. Does the plan address the impact of each hazard on the jurisdiction?	Section II, pp. 10-20	The plan does not address the impact of one of the five hazards addressed in the plan. Required Revisions: • Include a description of the impact of earthquakes on the assets. Recommended Revisions: • This information can be presented in terms of dollar value or percentages of damage.	✓			✓
SUMMARY SCORE			✓			✓

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK**FEMA REGION VIII**

Jurisdiction: Treasure County and Town of Hysham, Montana

Local Mitigation Plan Review and Approval Status

Jurisdiction: Treasure County and Town of Hysham, Montana	Title of Plan: Treasure County Pre-Disaster Mitigation Plan and Community Wildfire Protection Plan	Date of Plan: May 2007
Local Point of Contact: Pat Zent	Address: P.O. Box 326 Hysham, MT 59038	
Title: Disaster and Emergency Services Coordinator		
Agency: Treasure County, Montana		
Phone Number: (406) 698-3778	E-Mail: zentp33@yahoo.com	

State Reviewer: Kent Atwood	Title: State Hazard Mitigation Officer	Date: July 6, 2007
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FEMA Reviewer: Kathleen Collins Nan Johnson	Title: Senior Planner, URS Corp. FEMA R8 Mitigation Div., RA Branch, Planner	Date: 08/20/2007 12/17/07
Date Received in FEMA Region VIII	July 11, 2007	
Plan Not Approved		
Plan Approved	XXXXXX [Note: FMA requirements were not met.]	
Date Approved	December 17, 2007	

Jurisdiction:	NFIP Status*			
	Y	N	N/A	CRS Class
1. Treasure County, Montana (Effective 12/18/86)	X			10
2. Town of Hysham (NSFHA)			X	-
3.				

* Notes:

Y = Participating

N = Not Participating

N/A = Not Mapped

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: Treasure County and Town of Hysham, Montana

LOCAL MITIGATION PLAN REVIEW SUMMARY

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. A "Needs Improvement" score on elements shaded in gray (recommended but not required) will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

N – Needs Improvement: The plan does not meet the minimum for the requirement.

Reviewer's comments must be provided.

S – Satisfactory: The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Prerequisite(s) (Check Applicable Box)

Adoption by the Local Governing Body:
§201.6(c)(5) and §78.5(f)

OR

Multi-Jurisdictional Plan Adoption: §201.6(c)(5)
and §78.5(f) **AND**

Multi-Jurisdictional Planning Participation:
§201.6(a)(3) and §78.5(a)

Planning Process

Documentation of the Planning Process:
§201.6(b) and §201.6(c)(1) and §78.5(a)

Risk Assessment

Identifying Hazards: §201.6(c)(2)(i) and §78.5(b)

Profiling Hazards: §201.6(c)(2)(i) and §78.5(b)

Assessing Vulnerability: Overview:
§201.6(c)(2)(ii) and §78.5(b)

Assessing Vulnerability: Identifying Structures:
§201.6(c)(2)(ii)(A) and §78.5(b)

Assessing Vulnerability: Estimating Potential
Losses: §201.6(c)(2)(ii)(B)

Assessing Vulnerability: Analyzing Development
Trends: §201.6(c)(2)(ii)(C)

Multi-Jurisdictional Risk Assessment:
§201.6(c)(2)(iii) and FEMA 299

STAFFORD		FMA	
NOT MET	MET	NOT MET	MET

	X		X

N	S	N	S
	X		X

N	S	N	S
	X		X
	X		X
	X		X
	X	X	
	X		X
	X		X
	X		X

Mitigation Strategy

Local Hazard Mitigation Goals: §201.6(c)(3)(i) and §78.5(c)

Identification and Analysis of Mitigation Actions:
§201.6(c)(3)(ii) and §78.5(d)

Implementation of Mitigation Actions:
§201.6(c)(3)(iii) and §78.5(d) and (e)

Multi-Jurisdictional Mitigation Actions:
§201.6(c)(3)(iv) and FEMA 299

Please fill in completely

Plan Maintenance Process

Monitoring, Evaluating, and Updating the Plan:
§201.6(c)(4)(i) and §78.5(e)

Incorporation into Existing Planning Mechanisms:
§201.6(c)(4)(ii)

Continued Public Involvement: §201.6(c)(4)(iii)

Please fill in completely

Additional State Requirements*

Insert State Requirement

Insert State Requirement

Insert State Requirement

Please fill in

LOCAL MITIGATION PLAN APPROVAL STATUS

PLAN NOT APPROVED

PLAN APPROVED
(Pending Adoption)

Please fill in

*States that have additional requirements can add them in the appropriate sections of the *Multi-Hazard Mitigation Planning Guidance* or create a new section and modify this Plan Review Crosswalk to record the score for those requirements.

See Reviewer's Comments

STAFFORD		FMA	
N	S	N	S
	X		X
	X		X
	X	X	
	X		X

STAFFORD		FMA	
N	S	N	S
	X		X
	X		X
	X		X

STAFFORD		FMA	
N	S	N	S

STAFFORD	FMA
	X

STAFFORD	FMA
X	

Reviewer's General Comments: An Overview of the Treasure County and Town of Hysham, Montana Plan

Overall Comments

The plan contains very strong mapping and much structural data is included in the plan. The one weakness is the ranking of low, moderate and high for probability, and other impacts. In some instances the ranking appears to be based on gut feelings rather than quantifiable information. Including a description of how rankings were developed and who participated in the ranking process would greatly strengthen the plan. However, the plan generally will meet Stafford requirements, once the plan is formally adopted. The plan did not pass FMA requirements.

Plan Organization/ Format

The plan is fairly well organized and the maps are very descriptive and legible. However, numerous requirement elements in the hazard profiles makes it more difficult for the reviewer to determine if all requirements were met for all hazards. Consider developing the plan based on crosswalk elements as the outline for the table of contents as sections in the plan, such as vulnerability, extent, probability, impacts, etc.

Public/Stakeholder Participation & the Planning Process

The plan would be improved if it included more information regarding the public discussions at the workshops and when the consultant worked privately with County staff. In addition to the introduction paragraphs regarding mitigation planning in general, there should be a discussion of how the participants expressed their view of the affect of this planning effort on their specific jurisdiction.

Risk Assessment

- The plan did not pass FMA requirements as repetitive flood losses were not identified or evaluated in the plan. Also technical feasibility of mitigation projects was not included as a criterion for project prioritization. See crosswalk pages 20-21 for more details.

Overall the risk assessment provided an abundance of information and did its best to quantify data. However, as indicated above, including all of the risk assessment subcategories (e.g. extent, previous occurrence, etc.) within each hazard profile creates a difficulty for the reviewer who then has to flip back through sections that have already been reviewed. Consider making these sections of the plan and then list the hazards being assessed under each section. As indicated earlier the ranking methodology needs to be described and included in the plan.

Mitigation Strategy

- The proposed projects are mostly post-disaster actions, such as building shelters, etc. Many of the mitigation efforts relate to educating the public and would be considered preparedness versus mitigation. In future updates, provide actions that are more mitigation focused such as structural enhancements and/or adopting local and county policies that promote keeping structures out of hazard prone areas.
- Consider the accumulation of better data as a mitigation action item/project.
- Include expanded NFIP continued participation as an action item.
- Included technical feasibility, as defined in the rule, as a criterion for project prioritization

Plan Maintenance

Plan maintenance procedures were adequately described.

About Plan & Crosswalk Reviews in General:

Your multi-hazard mitigation plan's review includes five required DMA & FMA components: adoptions by the participating jurisdictions, consideration of the public/stakeholder participation and planning process, the risk assessment, the mitigation strategy, and the maintenance of the plan. In addition to these requirements, your plan is considered for its format and organization such that it is a user friendly document that is legible and easily understood.

We look to see if your plan meets the requirements and gauge if there is opportunity to strengthen the weaker segments of the plan. If so, we offer suggestions and recommendations for improvements often referring to additional resources or to guide the plan's developer(s) back to the FEMA "How-To Guides." In your plan updates, these recommendations may or may not be required as part of the improvement to the overall quality of submitted plans, which in turn helps to build stronger mitigation project applications. If a requirement has not been met, language will be included in red text for "Required Revisions" needed for the plan's approval. Please keep in mind that your State Hazard Mitigation Officer (SHMO) is a team member and a resource available to you during the multi-hazard mitigation planning process.

In addition, recommended revisions are provided in order to share various approaches available to meet plan requirements for each element of the crosswalk. Several resources are identified in the recommendations that may allow for more informed decision-making in the development of the mitigation strategy.

- **Plan Format/Organization**

Reviewers look for documents that are well-organized, easy to read, and structured in a way that requirements met are easily identified. A general recommendation is to use the crosswalk elements as an outline in developing the plan's table of contents.

- **Adoptions**

Provide unsigned copy(-ies) of the resolutions or certificates with the plan. After a plan has been determined "approvable" then the jurisdictions are asked to adopt the plan. This is to make sure that any requested revisions are captured as part of the adopted plan.

- **Public/Stakeholder Participation and the Planning Process**

Providing supporting documentation of public/stakeholder involvement and outreach activities is strongly recommended. Documentation would include meeting notes, copies of invitations to meetings that were distributed, and sign-in sheets that indicate who and which jurisdictions were represented at planning meetings. It is also critical to describe the type of discussions held at public meetings to ensure that the mitigation strategy represents the viewpoints of all participating jurisdictions.

- **Risk Assessment**

Identifying references for data presented in the plan is an important consideration. Referenced data should be commonly acknowledged as a reliable resource in order for the risk assessment to be meaningful. If reliable data is not available for meeting plan requirements, consider making it a mitigation action to obtain the data. Reviewers will typically include a list of internet resources for the plan preparation team in an effort to strengthen revised drafts and updates. Reviewers will have already visited many of these sites to ensure they include data specific to the participating jurisdictions. Another important consideration is to assess the interrelation between hazards, i.e. wildfire impacts that can lead to soil erosion, which then can lead to potential flash flooding. In addition, an assessment of how risks vary or are unique within an individual participating jurisdiction should be included in the plan.

- **Mitigation Strategy**

Good plans are to be driven by their goals, objectives, strategies, and priorities; not by their projects. The mitigation strategy is to be based on the risk assessment findings. Also, keep in mind that grant eligibility for mitigation is primarily focused on long-term mitigation projects and not on preparedness, which are the short-term immediate response focused projects (i.e. only 5% of HMGP is eligible for preparedness projects).

- **Plan Maintenance**

The development of a plan is intended to be an evolving process. Therefore, it is anticipated that plan updates display an effort to improve the major components of the plan including providing more details about and improving the public involvement, risk assessment, mitigation strategy, and plan maintenance activities.

Color Coding of Crosswalk Comments: Red = did not meet requirement, Blue = recommendation, Black = general comment/observation.

PREREQUISITE(S)

Adoption by the Local Governing Body

- **Multihazard Requirement §201.6(c)(5):** *[The local hazard mitigation plan **shall** include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council).*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Has the local governing body adopted the plan?	N/A					
B. Is supporting documentation, such as a resolution, included?	N/A					
SUMMARY SCORE						

Multi-Jurisdictional Plan Adoption

- **Multihazard Requirement §201.6(c)(5):** *For multi-jurisdictional plans, each jurisdiction requesting approval of the plan **must** document that it has been formally adopted.*
- **FMA Requirement §78.5(f):** *Documentation of formal plan adoption by the legal entity submitting the plan (e.g., Governor, Mayor, County Executive).*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan indicate the specific jurisdictions represented in the plan?	Pages 2-1 through 2-6	Treasure County and the Town of Hysham are clearly listed on the cover and in Section 2 as the specific jurisdictions represented in the plan.		X		X
B. For each jurisdiction, has the local governing body adopted the plan?	Page 1-1	<p>Yes. Both Treasure County and the Town of Hysham have adopted the plan.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> In the main text of the final plan, document when, and by whom, the plan was formally adopted. <p>For more information about adopting the mitigation plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 1.</p>		X		X
C. Is supporting documentation, such as a resolution,	Page 1-1	Yes. Resolution 2008-06 was signed by the		X		X

included for each participating jurisdiction?		Treasure County Board of Commissioners on September 18, 2007, and the Town of Hysham adopted the plan on September 12, 2007 (Resolution #07/08-3). Make sure all appropriate signature titles and notary seals are included on the signed resolutions (Hysham is missing this info – will be requested to correct). For more information about adopting the mitigation plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 1.				
SUMMARY SCORE				X		X

Multi-Jurisdictional Planning Participation

- **Multihazard Requirement §201.6(a)(3):** *Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process ... Statewide plans will not be accepted as multi-jurisdictional plans.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			NOT MET	MET	NOT MET	MET
A. Does the plan describe how each jurisdiction participated in the plan's development?	Page 3-1; Appendix A and C	On page 3-1 the Plan indicates that a series of five workshops were held throughout the planning process (Feb 06-April 07). In addition, the Plan states that participants included representatives from Treasure County and the Town of Hysham. Appendix A contains a list of stakeholders identified and invited to participate in a series of plan development workshops. The list includes a large number of Treasure County representatives and staff but only includes one person from the Town of Hysham, the mayor. Appendix C contains the sign-in sheets from each workshop. The Mayor of Hysham is the only Hysham representative noted to have attended a workshop. An internet search did not indicate a planning department in the Town of Hysham.		X		X

		<p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ A discussion describing what role each jurisdiction played during the planning process would improve this plan. If the Town of Hysham does not have a large staff, private town leaders may be identified. ▪ This section (not in an appendix but rather in the description of the planning process) should include all public discussions (or summaries) on how the community arrived at and decided upon its hazard and risk analyses, vulnerability assessment, the communities' goals, objectives, actions, and projects, as well as the prioritization of these. ▪ To improve the public outreach process someone or persons from the planning team or county commissioners are strongly recommended to champion the plan and bring it to the attention of the community through community organizations such as churches, rotary clubs, and others. More outreach to ensure success of public involvement is needed. Include an opportunity to engage elected officials, key stakeholders, and community leaders. <p>Refer to FEMA How-To Guide #1 on initiating a comprehensive local mitigation planning process, see Getting Started (FEMA 386-1), Steps 1-3.</p>				
SUMMARY SCORE				X		X

PLANNING PROCESS:

Documentation of the Planning Process

- **Multihazard Requirement §201.6(b):** *An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process **shall** include:*
 - (1) *An opportunity for the public to comment on the plan during the drafting stage and prior to plan approval;*
 - (2) *An opportunity for neighboring communities, local and regional agencies involved in hazard mitigation activities, and agencies that have the authority to regulate development, as well as businesses, academia and other private and non-profit interests to be involved in the planning process; and*
 - (3) *Review and incorporation, if appropriate, of existing plans, studies, reports, and technical information.*
- **Multihazard Requirement §201.6(c)(1):** *[The plan **shall** document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.*
- **FMA Requirement §78.5(a):** *Description of the planning process and public involvement. Public involvement **may** include workshops, public meetings, or public hearings.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan provide a narrative description of the process followed to prepare the plan?	Pages 3-1 through 3-3	The plan indicates the entire process utilized in the development of the plan. The plan starts with the County receiving the grants to hire the consultant to complete the PDM plan and CWPP at the same time. The plan describes how the consultant worked with the local DES Coordinator to develop a list of stakeholders that includes a number of federal, state and local officials as well as interested business owners, farmers and ranchers. The stakeholders were invited to a series of five workshops where the plan was developed using a rational planning method. At the first workshop, the mission statement was developed and the list of hazards was identified. At the second workshop hazards and critical facilities were mapped. The third workshop focused specifically on the wildfire hazard. At the fourth workshop, participants reviewed the risk assessment results and developed mitigation project ideas. At the final workshop the draft plan was reviewed and implementation was discussed.		X		X

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK
FEMA REGION VIII

Jurisdiction: Treasure County and Town of Hysham, Montana

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
		Recommended Revisions: <ul style="list-style-type: none"> Describe how the process and roles were decided and any discussions, questions, concerns, and issues from those deciding and leading the process. This should include how the participating jurisdictions were approached and involved in the process of developing the plan and how decisions were made amongst the jurisdictions. The planning process discussion should reflect the logical steps of development as outlined in the FEMA "How To" guides. Describe the time period to complete the plan, the type and outcome of meetings and/or workshops held. <p>For more information on the planning process and advice to jurisdictions seeking to initiate a comprehensive local mitigation planning process, see <i>Getting Started (FEMA 386-1)</i>, Step 1</p>				
B. Does the plan indicate who was involved in the planning process? (For example, who led the development at the staff level and were there any external contributors such as contractors? Who participated on the plan committee, provided information, reviewed drafts, etc.?)	Pages 3-1 through 3-3; Appendix C	The plan indicates that the Treasure County Disaster and Emergency Services Coordinator, Pat Zent, managed the grants for the County and evaluated the progress of the plan through progress reports and updates on the consultant's website. Other plan participants included Treasure County and Town of Hysham elected officials as well as representatives from Federal, State and Local agencies. Appendix C includes the sign-in sheets from the five workshops described above. They appear to have been well attended by a good representative group of community members, including Ina Haines, who listed her title as the Treasure County Planning Board Secretary. An internet search did not find the Treasure County Planning Board or a planning department for the Town of Hysham, but the		X		X

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
		<p>documentation was good to show that the planning board was involved in the planning process.</p> <p>Recommended Revisions:</p> <p>Including all of the existing community planning entities in the planning process is strongly recommended when possible.</p>				
C. Does the plan indicate how the public was involved? (Was the public provided an opportunity to comment on the plan during the drafting stage and prior to the plan approval?)	Page 3-2; Appendix B	<p>The public was invited to the five workshops where the plan was developed. Invitations were sent to a long list of stakeholders that included members of the citizenry. Also, press releases, advertisements and articles were written in the local newspaper, "The Hysham Echo." Finally, announcements and additional information, including draft documents were available on the planning consultant's website.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> To engage additional stakeholders and the general public it may be beneficial to coordinate with other state and local agency meetings. Consider additional ways to advertise public meetings such as posters, radio, and flyers to optimize public attendance; and placing copies of the plan in public places such as the library. <p>For more ideas on generating public interest, enlisting partners, and choosing an appropriate public participation model, see <i>Getting Started</i> (FEMA 386-1), Step 3.</p>		X		X
D. Was there an opportunity for neighboring communities, agencies, businesses, academia, nonprofits, and other interested parties to be involved in the planning process?	Page 3-2 Appendix A	<p>The Plan indicates that there were five workshops open to the public and to neighboring communities and other interested parties. Press releases were distributed and paid advertisements were printed in the local newspaper. The Plan also indicates that</p>		X		X

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: Treasure County and Town of Hysham, Montana

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
		<p>invitations were sent to communities beyond Treasure County, thus allowing neighboring communities and regional agencies the opportunity to participate. Appendix A provides a list of stakeholders that attended the meeting.</p> <p>Recommended Revisions:</p> <p>Consider additional ways to advertise public meetings in order to engage neighboring communities, and other interested parties such as providing press releases to regional newspapers, posters, radio/TV interviews, and flyers to optimize public attendance. Active participation requires outreach – going out to other venues such as an economic development group to discuss these planning efforts with theirs and seek their insights on how they may benefit one another.</p>				
E. Does the planning process describe the review and incorporation, if appropriate, of existing plans, studies, reports, and technical information?	Page 3-2	<p>The plan indicates that information from existing plans, studies, reports and technical information related to hazards, mitigation and community planning was gathered by the planning consultant. The documents referenced include a Treasure County Planning Data Book and Comprehensive Plan from 1979, the Treasure County Comprehensive Development Plan/Growth Policy from 2003, the Treasure County Subdivision Regulations (2005), and the State of Montana Multi-Hazard Mitigation Plan and Statewide Hazard Assessment (2004).</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> The Team should expand its stakeholders so that other plans, studies, and documents (building codes, zoning ordinances, floodplain ordinances and studies, economic development reports and/or plans) could be reviewed and analyzed. 		X		X

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: Treasure County and Town of Hysham, Montana

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
		<p>An economic development plan, among other plans, can have a significant role in mitigation. It is important to expand the scope of the Mitigation Team to bring partners who can bring other opportunities to the goals and strategies of the plan other than emergency preparedness.</p> <ul style="list-style-type: none"> Identify elements from other plans that are or will be incorporated into this plan – make note of it – provide sources for data and information referenced to create this plan. 				
SUMMARY SCORE				X		X

RISK ASSESSMENT: §201.6(c)(2): *The plan shall include a risk assessment that provides the factual basis for activities proposed in the strategy to reduce losses from identified hazards. Local risk assessments must provide sufficient information to enable the jurisdiction to identify and prioritize appropriate mitigation actions to reduce losses from identified hazards.*

Identifying Hazards

- Multihazard Requirement §201.6(c)(2)(i):** *[The risk assessment shall include a] description of the type ... of all natural hazards that can affect the jurisdiction.*
- FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including estimates of the number and type of structures at risk, repetitive loss properties, and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
<p>A. Does the plan include a description of the types of all natural hazards that affect the jurisdiction?</p> <p>If the hazard identification omits (without explanation) any hazards commonly recognized as threats to the jurisdiction, this part of the plan cannot receive a Satisfactory score.</p> <p>Consult with the State Hazard Mitigation Officer to identify applicable hazards that may occur in the planning area.</p>	<p>Pages 4-2 through 4-3</p> <p>Pages 4-28 through 4-180</p>	<p>The plan provides a table of fifteen hazards with the jurisdiction affected, how the hazard was identified (source of information) and why that hazard was profiled. The hazards were identified and agreed upon at a facilitated workshop. The facilitator conducted research from reputable sources to ensure the final list did not overlook a hazard.</p> <p>Each natural hazard is profiled in detail in Section 4.5. The hazard mapping is excellent. The plan</p>		X		X

		<p>would be improved with a composite map that includes all the moderate-high hazards and structures.</p> <p>Risk Assessment Information:</p> <p>The plan includes information for all identified hazards and in most cases the data used is more extensive than that found from readily available on-line resources. According to www.sheldus.org, the top three hazards, which have resulted in the most property damage in Treasure County, are tornados, and then hail and then flooding. For more information refer to SHEL DUS (www.sheldus.org).</p> <p>No Flood Insurance Study is available for Treasure County according to http://msc.fema.gov/. However, there is Q3 data available for Treasure County. These maps should be used to identify the flood hazards with respect to the local communities. Refer to www.hazards.gov</p> <p>Online EPA data suggests that there are no toxic release inventory sites in Treasure County. Please see http://www.epa.gov/triexplorer/ for more information.</p> <p>The plan includes presidential declaration information for drought and wildfires. Refer to http://www.peripresdecusa.org for additional presidential declaration information in your community.</p> <p>Sixteen dams are identified in the plan and are all low hazard dams and therefore would not require an Emergency Action Plan (EAP) as required by the National Dam Act. However, high hazard dams do require an EAP.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Make sure hazard risk assessment is reasonable and links to proposed mitigation actions. It is recommended to consider all potential 				
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		<p>hazards but then select for mitigation actions only those that have at least three of the following characteristics as a result of the hazard analysis: 1) potential or previous effects, 2) high probability of occurrence, 3) high vulnerability to, and 4) hazards they can mitigate against.</p> <ul style="list-style-type: none">▪ Addressing manmade hazards in the plan is not necessary to meet the DMA 2000 requirements, but highly encouraged. For more information, see <i>Integrating Manmade Hazards into Mitigation Planning</i> (FEMA 386-7), Phase 2. <p>Recommended References:</p> <ul style="list-style-type: none">▪ FEMA's new Flood Map Modernization site: www.hazards.gov and Map Viewer at: http://hazards.fema.gov/mapviewer/ will track and post development of new digital flood plain mapping.▪ The National Bridge Inventory data (http://www.nationalbridgeinventory.com) may assist with assessing the vulnerability of state's transportation system as well as the State owned or operated infrastructure.					
SUMMARY SCORE					X		X

Profiling Hazards

- **Multihazard Requirement §201.6(c)(2)(i):** [The risk assessment **shall** include a] description of the ... location and extent of all natural hazards that can affect the jurisdiction. The plan **shall** include information on previous occurrences of hazard events and on the probability of future hazard events.
- **FMA Requirement §78.5(b):** Description of the existing flood hazard and identification of the flood risk,, and the extent of flood depth and damage potential.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the risk assessment identify the location (i.e., geographic area affected) of each natural hazard addressed in the plan?	Pages 4-28 through 4-180	<p>The hazard profiles contain sections titled description, history, and mapping which identify the location of all natural hazards. In addition, the Plan provides excellent mapping of locations for earthquakes, flood, landslides, and severe thunderstorms.</p> <p>Recommended Revisions: When appropriate, provide a composite map (i.e., a map showing combined information from different thematic map layers) for hazards with a recognizable geographic extent, such as floods, drought and urban fire, if the individual hazard boundaries remain legible. Provide narrative and/or map info, which shows locations with past flooding problems and/or repetitive loss properties.</p>		X		X
B. Does the risk assessment identify the extent (i.e., magnitude or severity) of each hazard addressed in the plan?	Pages 4-28 through 4-180	<p>Section 4.5 includes 152 pages of hazard profile information including the location and extent of each natural hazard addressed in the plan. Extent is referenced relating to the magnitude of past events that is described.</p> <p>Recommended Revisions</p> <ul style="list-style-type: none"> ▪ Include in the hazard profile conditions such as topography, soil characteristics, and meteorological conditions that may exacerbate or mitigate the potential effects of a particular hazard. See <i>Understanding Your Risks</i> (FEMA 386-2), page 2-13 for information on these conditions and their effect on hazards like floods. 		X		X

		<ul style="list-style-type: none"> Include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts. <p>For more information on profiling hazards and mapping techniques, see <i>Understanding Your Risks</i> (FEMA 386-2) Step 2 pages 2-3 & Step 3, pages 3-6.</p>				
C. Does the plan provide information on previous occurrences of each hazard addressed in the plan?	Pages 4-28 through 4-180	<p>Previous occurrences, for each identified hazard, are included in the hazard profiles under the history section.</p> <p>Recommended References:</p> <ul style="list-style-type: none"> Refer to http://www.rurdev.usda.gov/rd/disasters/ for information on current Presidential Disaster Declarations and http://www.peripresdecusa.org/mainframe.htm - for information on past declarations. It appears that Treasure County received Presidential Declarations in 1978 for flooding, 1997 for severe winter storm and 200 for wildfires. Select begin search to get information at the county level. <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Include in the description for each event the duration of the event. Include in the mitigation strategy actions for collecting the data to complete and improve future risk analysis efforts. <p>For more information on profiling hazards, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 2.</p>		X		X
D. Does the plan include the probability of future events (i.e., chance of occurrence) for each hazard addressed in the plan?	Pages 4-28 through 4-180	<p>Section 4.5 includes 152 pages of hazard profile information including a discussion on the probability of future events. Probability is based on the number of past occurrences and other uncertain indicators. The probability section of the plan is weak and could be strengthened by using a more uniform and quantifiable method to determine probability for each hazard. Probability is ranked as high, moderate and low. The ranking in some instances appears to be random, such as ranking bioterrorism as moderate to</p>		X		X

		<p>high.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ If data is not available to accurately define probability, develop a mitigation action to create a hazards database. ▪ Use larger/comprehensive databases when possible for determining probabilities for hazards. ▪ See “How To” manuals at http://www.fema.gov/fima/resources.shtm. <p>For more information on profiling hazards, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 2.</p>				
SUMMARY SCORE				X		X

Assessing Vulnerability: Overview

- **Multihazard Requirement §201.6(c)(2)(ii):** *[The risk assessment **shall** include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description **shall** include an overall summary of each hazard and its impact on the community.*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, ..., and the extent of flood depth and damage potential.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include an overall summary description of the jurisdiction's vulnerability to each hazard?	Page 4-26 and pages 4-131 through 4-180	<p>The hazard profiles contain a section on vulnerability for each identified hazards. This section analyzes: critical and special needs facilities, structures, infrastructure, population, economic, ecological, historic and social values, and future development.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ The plan can be further strengthened by better relating types of hazards and the specific impact the hazard has on a community. Are there schools and grocery stores in places likely to flood – where? Are there older structures or neighborhoods that are either historic or built before building codes were developed that address tornados? Are there properties or roads that have been impacted by repetitive flooding? Which power lines are most likely to be impacted by repetitive winter ice storms or strong winds? <p>For a discussion on vulnerability assessment overview, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a, Inventory Assets.</p>		X		X
B. Does the plan address the impact of each hazard on the jurisdiction?	Pages 181 through 190	Section 4.6 provides a summary of the impacts of each hazard on the jurisdiction. Each hazard is given a ranking (low, low-moderate, moderate, moderate-high or high) in six impact categories. The categories are impact to: critical and special needs facilities, structures, infrastructure, population, economic, ecologic, historic and social values, and future development. There is no discussion in the plan regarding how these ratings were developed,		X		X

		<p>who decided the ranking and what they mean. In addition each hazard profile includes a history section, which identifies previous occurrences and the impact to the community.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ The plan would be improved if there were more explanation in Section 4.6 regarding how the impact categories are defined, what the ranking categories mean in terms of loss or \$ value and or persons, and also an explanation of who was involved in the ranking process. ▪ Impacts can relate to loss of life, economic loss, water quality damage, environmental losses, and closure of schools, businesses and infrastructure. Other impacts include loss of homes, historic preservation losses, along with growth management and rebuilding challenges. ▪ This information could be presented in terms of dollar value, percent of damage, type and level of damage to buildings, infrastructure, and critical facilities; days of duration, etc. FEMA declaration information could be very insightful in portraying the impacts. 				
SUMMARY SCORE				X		X

Assessing Vulnerability: Identifying Structures

- **Multihazard Requirement §201.6(c)(2)(ii)(A):** *The plan **should** describe vulnerability in terms of the types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard area*
- **FMA Requirement §78.5(b):** *Description of the existing flood hazard and identification of the flood risk, including **estimates of the number and type of structures at risk, repetitive loss properties**,....*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe vulnerability in terms of the types and numbers of existing buildings (including repetitive loss structures) , infrastructure, and critical facilities located in the identified hazard areas?	Page 4-12 Section 4, pp 4-28 through 4-180	<p>Section 4.5 profiles each hazard and includes a section related to the vulnerability in terms of the types and numbers of existing buildings. This is very well done for flood hazards and wildfire hazard. The other hazards are not as well done. In addition the plan includes an Assets and Community Inventory, which lists critical facilities, special needs facilities, and schools. However, the critical facilities are not in relationship to identified hazards.</p> <p>Required FMA Revisions: The plan was strong in identifying types of existing buildings in flood hazard areas; however, repetitive loss structures were not identified in the plan, which is necessary to receive a satisfactory rating for this requirement.</p> <p>The need exists to inventory structures located within areas that have repeatedly flooded and collect information on past insurance claims. Describe repetitive loss neighborhoods or areas in the plan.</p> <p>Recommended Stafford Revisions:</p> <ul style="list-style-type: none"> For each hazard, identify the kinds of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal); infrastructure, (e.g., roadways, bridges, utilities, and communications systems); and critical facilities (e.g., shelters, hospitals, police, and fire 		X	X	

		<p>stations).</p> <ul style="list-style-type: none"> If limited data are available, focus on identifying critical facilities located in the identified hazard areas and identify the collection of data for the remaining buildings and infrastructure as an action item in the mitigation strategy. Contact your State Hazard Mitigation Officer (SHMO) for information that may be readily available from the state to use in your vulnerability analysis. Your State Hazard Mitigation Officer (SHMO) works closely with FEMA to obtain available mapping resources and training opportunities – ask your SHMO about these resources <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the Stafford plan from passing.</p>				
B. Does the plan describe vulnerability in terms of the types and numbers of future buildings, infrastructure, and critical facilities located in the identified hazard areas?	Pages 4-28 through 4-180	<p>In each hazard profile the plan describes vulnerability in terms of ‘future development’. Each profile includes a general statement regarding the lack of growth in the County. Therefore, it does not describe the types and numbers of future buildings, infrastructure and critical facilities located in each hazard area.</p> <p>Recommended Revisions:</p> <p>The plan would be improved if more information was gathered related to future development trends. Even if very limited growth is anticipated; where is it most likely to occur and what types of structures are anticipated? What types of public infrastructure or critical facilities is Treasure County including in the capital improvements?</p> <p>Additional Suggestions:</p>		X		X

		<p>Identify the types of buildings (e.g., residential, commercial, institutional, recreational, industrial, and municipal buildings), infrastructure (e.g., roadways, bridges, utilities, and communications systems), and critical facilities (e.g., shelters, hospitals, police, and fire stations).</p> <p>Information on proposed buildings, infrastructure, and critical facilities, including planned and approved development, may be based on information in the comprehensive or land use plan, zoning maps, assessors records for subdivided parcels, capital improvement plans/projects, DOT projects, economic development plans, and real estate ads.</p> <p>Identify buildings, infrastructure, and critical facilities that are vulnerable to more than one hazard.</p> <p>Describe the process or method used for identifying future buildings, infrastructure, and critical facilities.</p> <p>Note any data limitations for determining the type and numbers of future buildings, infrastructure, and critical facilities and include in the mitigation strategy actions for collecting the data to improve future vulnerability assessment efforts.</p> <p>For a discussion on identifying vulnerable structures and detailed inventories, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 3, Worksheet #3a and #3b, Inventory Assets.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the plan from passing</p>				
		SUMMARY SCORE		X	X	

Assessing Vulnerability: Estimating Potential Losses

- **Multihazard Requirement §201.6(c)(2)(ii)(B):** *[The plan **should** describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan estimate potential dollar losses to vulnerable structures?	Pages 4-28 through 4-180	<p>The plan provides estimates of potential dollar losses to structures within each hazard profile.</p> <p>Additional Suggestions:</p> <ul style="list-style-type: none"> ▪ Include, when resources permit, estimates for structure, contents, and function losses to present a full picture of the total loss for each building, infrastructure, and critical facility. ▪ Include in the mitigation strategy actions, collecting the data to improve future loss estimate efforts. ▪ HAZUS-MH is a program that estimates potential losses for hazards. Contact your SHMO for information. <p>For a step-by-step method for estimating losses, see <i>Understanding Your Risks</i> (FEMA 386-2), Step 4.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing</p>		X		X
B. Does the plan describe the methodology used to prepare the estimate?	Pages 4-28 through 4-180.	<p>The plan indicates that HAZUS-MH was used to estimate the potential dollar losses and can be found within each hazard profile.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing</p>		X		X
SUMMARY SCORE				X		X

Assessing Vulnerability: Analyzing Development Trends

- **Multihazard Requirement §201.6(c)(2)(ii)(C):** *[The plan **should** describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe land uses and development trends?	<p>Page 4-17 through 4-21</p> <p>Pages 4-28 through 4-180</p>	<p>The plan provides a discussion on current land use for Treasure County. The plan states "very little growth is occurring, however small population increases are possible". The County also anticipates industrial developments. The plan includes a governmental land ownership map and an aerial photo. In addition, each hazard profile includes a section devoted to 'Future Development.'</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ Provide a discussion on land use and development trends, where it is (or is not) happening, significant changes over last 10-20 years, and the types of structures being built to accommodate growth or have gone vacant and have opened possibilities to removal from a hazard area. ▪ Consider including population projections and growth in relation to identified hazard areas under the population discussion under each hazard profile. Cite references. <p>Additional Suggestions:</p> <ul style="list-style-type: none"> ▪ Overlay a land use map with identified hazard areas. ▪ Note any data limitations for determining development trends and include in the mitigation strategy actions for collecting the data to complete and improve future vulnerability assessment efforts. ▪ Provide a discussion of vacation home development and development that is occurring 		X		X

		<p>associated with tourism in your plan.</p> <p>Other Considerations</p> <ul style="list-style-type: none">▪ What recreational activities does your community provide that attracts visitors and tourists? How do they affect development in your community?▪ Although population may be decreasing it is important to identify the hazard prone areas to avoid future construction in hazard areas and/or identify existing structures that require retrofitting, moving or demolition. Land use and development trends for the future should be based on information such as approved subdivisions and annexations occurring in the jurisdictions seeking plan approval, and commentary from existing planning departments, public works/transportation departments, along with chamber of commerce data. <p><i>Note: A "Needs Improvement" score on this requirement will not preclude the plan from passing</i></p>				
SUMMARY SCORE				X		X

Multi-Jurisdictional Risk Assessment

- **Multihazard Requirement §201.6(c)(2)(iii):** *For multi-jurisdictional plans, the risk assessment **must** assess each jurisdiction's risks where they vary from the risks facing the entire planning area.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan include a risk assessment for each participating jurisdiction as needed to reflect unique or varied risks?	Pages 4-28 through 4-180	In each hazard profile, the risk assessment mentions the Town of Hysham in particular, and if the hazard risks are different for the town as opposed to the entire county. The hazard occurrences are well mapped, allowing a clear picture of where the hazard areas are more concentrated within the Town of Hysham jurisdictional boundaries as opposed to the County as a whole. Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.		X		X
SUMMARY SCORE				X		X

MITIGATION STRATEGY: §201.6(c)(3): *The plan shall include a mitigation strategy that provides the jurisdiction's blueprint for reducing the potential losses identified in the risk assessment, based on existing authorities, policies, programs and resources, and its ability to expand on and improve these existing tools.*

Local Hazard Mitigation Goals

- **Multihazard Requirement §201.6(c)(3)(i):** *[The hazard mitigation strategy **shall** include a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.*
- **FMA Requirement §78.5(c):** *The applicant's floodplain management goals for the area covered by the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include a description of mitigation goals to reduce or avoid long-term vulnerabilities to	Pages 5-1, 5-2 through 5-6	Section 5.1 describes the three very broad goals of the plan. There are multiple objectives for each goal		X		X

the identified hazards? (GOALS are long-term; represent what the community wants to achieve, such as “eliminate flood damage”; and are based on the risk assessment findings.)		and numerous projects that relate to each objective and are directly related to mitigation. The three goals are: 1) Promote the use of multi-hazard mitigation measures; 2) Prevent potential wildfire losses; and 3) Reduce future losses from winter storms and floods.				
SUMMARY SCORE				X		X

Identification and Analysis of Mitigation Actions

- **Multihazard Requirement §201.6(c)(3)(ii):** *[The mitigation strategy **shall** include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.*
- **FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify and analyze a comprehensive range of specific mitigation actions and projects for each hazard?	Pages 5-9 through 5-10	<p>The plan provides a matrix showing the number of hazards potentially mitigated by each project. This matrix shows that every hazard has a project that could potentially help mitigate loss of life and property.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> List actions to address data limitations. Actions must correlate to the findings of the risk assessment. It is recommended to provide at least two actions for each hazard assessed. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p>		X		X
B Do the identified actions and projects address reducing the effects of hazards on new buildings and infrastructure?	Pages 5-2 through 5-6	Many of the projects listed under Goal #1 include actions that address reducing the effects of hazards on new buildings and infrastructure such as Project 1.2.1: Growth Policy.		X		X

		<p>Recommended Revisions:</p> <ul style="list-style-type: none"> While the Rule does not specify critical facilities, the plan should also address new critical facilities. Develop a matrix to show what actions address specific hazards and new buildings and infrastructure. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>				
C. Do the identified actions and projects address reducing the effects of hazards on existing buildings and infrastructure?	Pages 5-2 through 5-6	<p>The identified actions and projects under the Goal #2, “Prevent potential wildfire losses” includes a number of projects that will reduce the effects of wildfire hazard on existing buildings and infrastructure, such as Project 2.2.1, Countywide Fuels Mitigation.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> While the Rule does not specify critical facilities, the plan should also address existing critical facilities with respect to the identified problem areas. One weak link is warning systems, which protect life, but do little to protect the built environment. Develop a matrix to show what actions address existing buildings and infrastructure. <p>For more details on identifying and evaluating mitigation actions, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 2.</p>		X		X
SUMMARY SCORE				X		X

Implementation of Mitigation Actions

- **Multihazard Requirement: §201.6(c)(3)(iii):** *[The mitigation strategy section **shall** include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization **shall** include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.*
- **FMA Requirement §78.5(d):** *Identification and evaluation of cost-effective and technically feasible mitigation actions considered; and*
- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the mitigation strategy include how the actions are prioritized ? (For example, is there a discussion of the process and criteria used?)	Pages 5-7 through 5-32	<p>Section 5.2 describes the process used for prioritizing the mitigation projects. The projects were discussed at one of the public workshops. The prioritization process involved a scoring system developed by the consultant.</p> <p>Recommended Revisions</p> <ul style="list-style-type: none"> Describe how the public was involved and who participated in the prioritization process for mitigation actions. Integrate prioritization process with applicable CWPP. <p>For a detailed description of the development of the mitigation strategy or action plan for the plan's updates, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 3.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the FMA plan from passing.</p>		X		X
B. Does the mitigation strategy address how the actions will be implemented and administered ? (For example, does it identify the responsible department, existing and potential resources, and timeframe?)	Pages 5-26 through 5-29	Section 5.4B addresses how the projects could be implemented and administered. The table includes the project, the responsible party, the potential funding and prioritization score developed in the previous section (Section 5.4A). Section 5.4C		X		X

		<p>includes a schedule for project implementation.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Include a cost estimate and/or resources required for each action, when possible. Provide both agency and title within the agency when identifying the responsible party. Including a name of a responsible party would also improve the plan. Contact Sonoran Institute at http://sonoran.org/ and NRCS for potential acquiring of open space to preserve hazard prone areas from development. <p>For a detailed description of the development of the mitigation strategy or action plan, see <i>Developing the Mitigation Plan</i> (FEMA 386-3), Step 3.</p>				
B.1. Does the mitigation strategy address continued compliance with the NFIP?		<p>The mitigation strategy does not address continued compliance with the NFIP.</p> <p>FMA Required Revisions</p> <p>The plan must address continued compliance with the NFIP. The Town of Hysham should consider participation in the NFIP.</p> <p>Recommended Revisions:</p> <p>More specifics on NFIP compliance as well as needs and successes for both jurisdictions will be required in the next update.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the Stafford plan from passing.</p>	X		X	
C. Does the prioritization process include an emphasis on the use of a cost-benefit review (see page 3-36 of <i>Multi-Hazard Mitigation Planning Guidance</i>) to maximize benefits?	Pages 5-7 through 5-20	<p>The prioritization process provided in Section 5.2 includes an emphasis on the use of a cost-benefit review to maximize benefits.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from</p>		X		X

LOCAL HAZARD MITIGATION PLAN REVIEW CROSSWALK

FEMA REGION VIII

Jurisdiction: Treasure County and Town of Hysham, Montana

		<i>passing.</i>				
C.1. Does the mitigation strategy emphasize cost-effective and technically feasible mitigation actions?	Pages 5-8	<p>The prioritization criteria do not include a criterion related to technical feasibility. Rather the word 'feasibility', in this plan, relates to public support for the project. Feasibility should relate to whether the technical resources exist in the jurisdiction to complete the mitigation action and in not then what resources would be necessary.</p> <p>Required Revisions:</p> <p>The plan should address whether the mitigation strategies are technically feasible given the resources in the jurisdiction.</p> <p>Note: A "Needs Improvement" score on this requirement will not preclude the Stafford plan from <i>passing.</i></p>	X		X	
SUMMARY SCORE				X	X	

Multi-Jurisdictional Mitigation Actions

- **Multihazard Requirement §201.6(c)(3)(iv):** *For multi-jurisdictional plans, there **must** be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.*
- **FMA FEMA 299 Guidance:** *The Plan should be coordinated with, and ideally developed in cooperation with, all of the local jurisdictions within the geographical area.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A Does the plan include at least one identifiable action item for each jurisdiction requesting FEMA approval of the plan?	Pages 5-2 through 5-6	<p>A number of the projects are specific to the Town of Hysham, especially as they relate to existing homes, since most of the existing homes are within the Town limits. The rest of the action items affect the entire county.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> ▪ The plan would be improved if participation in the action items was a responsibility of Town of Hysham officials, if they exist. <p>For more information on the development of the mitigation strategy or action plan, see <i>Developing the Mitigation Plan</i> (386-3), Step 3.</p>		X		X
SUMMARY SCORE				X		X

PLAN MAINTENANCE PROCESS

Monitoring, Evaluating, and Updating the Plan

- **Multihazard Requirement §201.6(c)(4)(i):** *[The plan maintenance process **shall** include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.*
- **FMA Requirement §78.5(e):** *Presentation of the strategy for reducing flood risks and continued compliance with the NFIP, and procedures for ensuring implementation, reviewing progress, and recommending revisions to the plan.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan describe the method and schedule for monitoring the plan? (For example, does it identify the party responsible for monitoring and include a schedule for reports, site visits, phone calls, and meetings?)	Pages 6-1 through 6-2	<p>The Treasure County Local Emergency Planning Committee will monitor the plan. This committee meets monthly, however the committee will formally meet regarding mitigation progress quarterly.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Monitoring may include periodic reports by agencies involved in implementing actions; parameters to measure the progress of the actions; and action completion dates. <p>For guidance on monitoring the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p>		X		X
B. Does the plan describe the method and schedule for evaluating the plan? (For example, does it identify the party responsible for evaluating the plan and include the criteria used to evaluate the plan?)	Pages 6-1 through 6-2	<p>The Treasure County Local Emergency Planning Committee will evaluate of the plan annually.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> The evaluation should assess whether goals and objectives address current and expected conditions; nature or magnitude of risks has changed; current resources are appropriate for implementing the plan; outcomes have occurred as expected; and agencies and other partners participated as originally proposed. <p>For guidance on evaluating the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 3.</p>		X		X

C. Does the plan describe the method and schedule for updating the plan within the five-year cycle?	Pages 6-1 through 6-2	<p>The plan describes the method and schedule for updating the plan within the five-year cycle.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Allow ample time for the review and adoption process to ensure the plan is adopted within the five-year cycle. Although communities may want to do their own annual plan updates or after a disaster occurs, FEMA will only be involved in reviewing updates in the five-year cycle. <p>For guidance on updating the plan, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 4.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>		X		X
SUMMARY SCORE				X		X

Incorporation into Existing Planning Mechanisms

- Multihazard Requirement §201.6(c)(4)(ii):** *[The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan identify other local planning mechanisms available for incorporating the requirements of the mitigation plan?	Pages 5-30 through 5-32	<p>The plan identifies other local planning mechanisms available for incorporating the requirements of the mitigation plan. This section includes a description of the Town of Hysham and the Treasure County government, which would be very helpful at the beginning of the document.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>		X		X
B. Does the plan include a process by which the local government will incorporate the requirements in other plans, when appropriate?	Pages 5-30 through 5-32	The plan addresses this issue but admits that very little planning mechanisms exist in the two participating jurisdictions.		X		X

		<p>Recommended Revisions:</p> <ul style="list-style-type: none"> Address specifically how this plan will be incorporated into other planning documents and make note of it in the plan. <p>For more information on integrating hazard mitigation activities in other initiatives, see <i>Bringing the Plan to Life</i> (FEMA 386-4), Step 2.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>				
SUMMARY SCORE				X		X

Continued Public Involvement

- Multihazard Requirement §201.6(c)(4)(iii):** *[The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE			
			STAFFORD		FMA	
			N	S	N	S
A. Does the plan explain how continued public participation will be obtained? (For example, will there be public notices, an on-going mitigation plan committee, or annual review meetings with stakeholders?)	Pages 6-2	<p>The plan explains that the public will be invited to future mitigation progress meetings through notices in the local newspapers.</p> <p>Recommended Revisions:</p> <ul style="list-style-type: none"> Include a schedule for public participation and outreach opportunities, who will be responsible for organizing events, who will maintain the Web site, etc. Consider other local resources besides the EM to lead this effort. Explain how public comments will be integrated into the plan updates. It is recommended that public outreach efforts include going out to community groups and organizations to inform community leaders about the plan and to obtain their input on future plan updates. 		X		X

		<ul style="list-style-type: none">Provide a process for incorporating public comments in plan updates. i.e. put out a public notice – give out locations of copies of the draft plan and ask for comments to be submitted within a certain timeframe (10-15 days). <p>For more information on keeping the public involved, see <i>Getting Started</i> (FEMA 386-1), Step 3 and <i>Bringing the Plan to Life</i> (FEMA 386-4), Steps 2 and 3.</p> <p>Note: A “Needs Improvement” score on this requirement will not preclude the FMA plan from passing.</p>				
SUMMARY SCORE				X		X